Interview with Steve Simanonok, April 5, 2021

Regarding Ocean Disposal of Waste Acid from Montrose DDT Plant, Torrance, California

Responses to questions from John Lyons and Andrew Helmlinger summarized below were from memory to the best of Steve's recollection, without aid of supporting documentation or notes. Steve indicated that he would defer to any documentation or available underlying records as a better source of information, even if contrary to his recollection. This summary of the April 5th, 2021 telephone interview with Steve Simanonok was prepared by Andrew Helmlinger (ORC) and John Lyons (SEMD); and finally, edited by Steve Simanonok for clarity.

In the early 1980s, Steve was an EPA inspector performing various pesticide, PCB, and Clean Water Act inspections. Around 1982, Steve was employed by EPA working as a field investigator. Later in the 1980s, he began working under Betsy Curnow in the Superfund Division as a civil investigator. In this capacity, beginning in 1989 and continuing for several years, Steve was detailed to NOAA to work on case development for the US v. Montrose Natural Resource Damage case. Steve recalled that there was an Interagency Agreement between NOAA and EPA under which NOAA would reimburse EPA for Steve's salary. Steve retired from EPA in 2008.

During his NOAA detail, Steve reported to Mark Eames, a NOAA staff attorney, as well as regularly reporting progress on his investigation to Gerald George at the Dept. of Justice. Initially, Steve was asked to investigate discharges of DDT and PCB into the LA County Sanitation District sewers that were believed to have contaminated sediments on the Palos Verdes shelf off the Southern California coast. Later, Steve was asked by NOAA and US DOJ to investigate the historic disposal of waste acid from the Montrose Chemical Corporation of California (Montrose DDT Plant) at deep-water ocean disposal sites off the coast of Southern California.

Steve recalls previously visiting the Montrose DDT plant, as an EPA inspector in the early 1980s, while it was still in operation in Torrance, California. Montrose's DDT production process used sulfuric acid. When the sulfuric acid became saturated with DDT, it was no longer useable in the DDT production process, and waste acid was generated. This waste acid was stored in bulk tanks at the Montrose DDT plant.

Later, from his investigation with NOAA, Steve learned that Montrose waste acid was disposed at sea. Specifically, when the waste acid tanks began to reach their capacity, Montrose contracted with various liquid waste haulers to haul this waste acid directly to California Salvage Company located in the Port of Los Angeles. The liquid acid waste was then pumped into a large holding tank on a California Salvage barge. California Salvage would then combine Montrose waste acid, with other compatible acid wastes, primarily waste acid from Southern California oil refineries. At this time, other barrels of liquid and solid industrial wastes from various waste generators throughout Southern California, were also loaded aboard the California Salvage barge.

California Salvage would tow the barge to permitted deep-water ocean disposal sites off the Southern California coast. Once there, the holding tanks in the barge were drained as the barge was towed on a circular course at the disposal site until the tanks were empty. While the holding tanks were being emptied at the disposal site, the barrels of liquid and solid waste from other generators, were dumped into the ocean for disposal. Steve also recalls learning that the US Coast Guard required that any of the barrels disposed at the deep-water ocean disposal site that did not initially sink, be shot with a rifle, so they would sink and not pose a hazard to navigation. Other versions of this story report that the barrels were breached with a fire axe before being dumped overboard. However, Steve found this version to be unlikely, as breaching the barrels on the deck of the barge would have contaminated the deck and exposed the crew to harmful substances. Furthermore, it would only be the barrels that floated that required breaching, and it difficult to imagine the boat, towing a barge, to breach barrels floating at sea with an axe.

Steve recalled that during his investigation, there were various allegations that California Salvage may have "short dumped," or otherwise, began discharging liquid wastes upon leaving the Port of Los Angeles. He interviewed personnel from several agencies, and was told that the boat towing the California Salvage barge was required to radio in to the Harbormaster when they left the port, as well as when they returned to port after disposing of their wastes at the ocean disposal sites. The Harbormaster maintained these logs to verify that the ship spent sufficient time at sea to voyage to the ocean disposal site location, conduct the dumping, and then return. However, Steve was never able to locate these logs, as they were ostensibly destroyed after they served their purpose. Finally, throughout his investigation, Steve never found any evidence that "short dumping" occurred.

When asked whether he knew of Montrose storing barrels of waste acid at their DDT plant, or whether any barrels of Montrose DDT waste were dumped at ocean disposal sites; he emphatically insisted that this was not the case. The documents that he collected all confirm that DDT waste acid was transported from the Montrose DDT plant by liquid waste haulers in bulk tanker trucks, loaded aboard California Salvage barges in bulk holding tanks, and discharged at sea as liquid waste as the barge circled the disposal site. However, he explained how this confusion regarding "barrels" has developed:

Steve stated that a handful of LA City and LA County agencies created an early system of tracking the transport and disposal of industrial wastes in the 1940s and 1950s. Steve recalls that multiple agencies coordinated this effort by requiring waste haulers to file monthly reports with these agencies. Basically, the few monthly reports from this era that he saw listed the generator of the waste, the type of waste, and the quantity of waste. However, the local agencies wanted a standard unit of measurement, so all waste haulers were required to report the quantity of waste in "barrels". It's unclear if those were 48-gallon barrels used by the oil industry, or 55-gallon barrels used by the waste industry. Regardless, any bulk liquid waste hauler knew the capacity of their tanker trucks, and had to divide that total volume by either 48

or 55 gallons to file a monthly report in "barrels". Inevitably, some liquid waste haulers probably arrived at California Salvage with partial loads, and it is unknown how those volumes were reported. Also, since the local agencies required reporting in barrels, some rounding errors were probably included in the monthly reports.
[It's interesting to note that this early tracking of industrial waste became the basis for the State of California to later require Liquid Waste Hauler reports. Ultimately, EPA would use this model to require a Uniform Hazardous Waste Manifest for each shipment of hazardous waste anywhere across the United States.

Steve's investigation focused on California Salvage disposal of Montrose DDT waste acid at the permitted deep-water ocean disposal site, Site # 1, in the Santa Cruz basin off the Southern California coast. Steve stated that this site was established by the US Navy after WWII to dispose of military munitions. In fact, the founders of California Salvage were ex-Navy personnel who were aware of the disposal site, and sought permits to expand the site for Southern California industrial waste, radioactive waste, laboratory waste, and medical waste. Steve recalls that at some point the disposal site was shifted to Site #2 in the San Pedro basin, but is unsure when this occurred.

In conducting his investigation of California Salvage, Steve reviewed documents at the IT Corporation offices in Torrance (Cal Salvage became Industrial Tank Corporation and later IT Corporation). At the IT Corp offices, Steve worked with a lawyer for IT who provided indices of California Salvage documents held in an offsite storage repository. Boxes of these records were delivered daily, and Steve reviewed the files, and requested copies of any relevant documents. At the end of each day, he would issue a Receipt for Documents, which listed the date, title, and number of pages for all the documents collected that day. The documents were given to NOAA for further review, and Steve was never asked to produce a final report.